## McNair Law Firm, P.A.

ATTORNEYS AND COUNSELORS AT LAW

176164 ±2: 10/31/05 10:30

11<sup>th</sup> Floor, Bank of America Tower Post Office Box 11390 1301 Gervais Street (29201) COLUMBIA, SOUTH CAROLINA 29211

TELEPHONE (803) 799-9800 FACSIMILE (803) 376-2219

October 5, 2005

The Honorable Charles Terreni Chief Clerk and Administrator South Carolina Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 RECEIVED

SO PUBLIC SERVED

SO

Re: Application of Quality Telephone, Incorporated for a Certificate of Public Convenience and Necessity to Provide Resold Local Exchange Services, Access Services and Resold Interexchange Telecommunications Services within the State of South Carolina (SCPSC Docket No. 2005-232-C)

Dear Sir or Madam:

Please find enclosed for filing on behalf of the South Carolina Telephone Coalition an original and ten (10) copies of a Petition to Intervene in the above-referenced docket. By copy of this letter and Certificate of Service appended to the Petition, I am serving all parties of record.

Please clock in a copy of the Petition and return it by our courier.

Should you have any questions with respect to this matter, please do not hesitate to contact me.

Very truly yours,

Margaret M. Fox

OK O. Duke

OK O. Duke

Enclosures

cc: John J. Pringle, Jr., Esquire Florence P. Belser, Esquire

#### BEFORE

### THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

	Docket No. 2005-232-C	100 Sept 100
Re:	Application of Quality Telephone, Incorporated ) for a Certificate of Public Convenience and ) Necessity to Provide Resold Local Exchange )	M 5 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
	Services, Access Services and Resold Inter-	PETITION TO
	exchange Telecommunications Services within the State of South Carolina	INTERVENE

In response to the Commission's Notice of the Filing of the Application of Quality Telephone, Incorporated for a Certificate of Public Convenience and Necessity to provide local exchange telecommunications services in South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

- SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.
- SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.
- SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.
Margaret M. Fox
McNair Law Firm, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

3y: /\_\_\_\_\_\_

Attorneys for Intervenor South Carolina

Telephone Coalition

October 5, 2005

Columbia, South Carolina

#### **BEFORE**

# THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2005-232-C

_		Ö	,	<b></b>	للا
Re:	Application of Quality Telephone, Incorporated	) 97	1 9	3	
	for a Certificate of Public Convenience and		j '	1	$\bigcirc$
	Necessity to Provide Resold Local Exchange		<del></del>	0	
	Services, Access Services and Resold Inter-	) CERTIFICATE	NE.		The state of the s
	exchange Telecommunications Services within	<b>)</b>	JF		-
	the State of South Carolina	SERVICE	5.2		L
		)	λń	$\bar{c}$	

I, ElizaBeth A. Blitch, do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following party of record by causing said copy to be deposited with the United States Mail, first class postage prepaid to:

John J. Pringle, Jr., Esquire Ellis, Lawhorne and Sims, P.A. Post Office Box 2285 Columbia, South Carolina 29210

Florence P. Belser, Esquire Office of Regulatory Staff Post Office Box 11263 Columbia, South Carolina 29211.

BlizaBoth A. Blitch, Paralegal

12

S

McNair Law Firm, P.A.

Post Office Box 11390

Columbia, South Carolina 29211

(803) 799-9800

October 6, 2005

Columbia, South Carolina